

MEMO

DATE: February 9, 1990
TO: Shirli Axelrod
FROM: Christy O'Quinn
SUBJECT: Disposal of Oily Dirt at the Georgetown Steamplant

In November, 1989, I reviewed a number of methods for disposing of the oily dirt at the Georgetown Steamplant. On the basis of my initial investigation I recommended that City Light work with Olds Olymipic and attempt to have the soil processed at the Sterling Asphalt plant in Kenmore. This "process" involved heating the soil as it passed through the asphalt plant in order to burn off the hydrocarbons; the escaping hydrocarbons are consumed as an energy source in the production of asphalt.

During the past few months, I have monitored Sterling Asphalt's efforts to resolve technical difficulties that prohibited this process from being used on a commercial basis. The principal difficulty involved controlling fugitive emissions, a problem stemming from the powdery consistency that soils take on after being heated to extremely high temperatures. Sterling Asphalt conducted experiments using a number of different wetting agents and eventually resolved this problem by adding water to the processed soils. This seemed to be an ideal solution since it resulted in a significant reduction in TPH levels, created no additional hazardous products, and allowed the soils to be reused as clean fill.

However, the EPA has now decided that the plant's emission stacks should be monitored for possible air quality violations, but has refused to cooperate with Sterling Asphalt in studying the issue. Sam apparently has gone to great lengths to gain EPA's approval, for example, he issued a proposal to EPA in which Sterling Asphalt would put up the funds to buy monitoring equipment that EPA would subsequently own and operate, if EPA would agree to monitor and study the emissions question. This arrangement would have allowed EPA to study the plant's operations and ultimately would have provided valuable information to support approval or rejection of the proposed soil decontamination process.

Unfortunately, the uncertainty surrounding the issue has forced Sterling Asphalt to reassess its position toward taking in off-site soils. And, although Sterling Asphalt is continuing to research other remediation techniques, it is unable to commit to processing the Georgetown soils. On a more positive note, the company has hired Dr. Terrell, University of Washington, to study the possibility of developing a portable microwave system for processing petroleum contaminated soils. Also, Sam is meeting with staff from other EPA regional offices to discuss the plant's current process method and determine what decontamination methods are being employed in other areas.

Therefore, I recommend that the soil be disposed of at the Cedarhills Landfill. Attached is a draft letter to Steve Burke at the King County Health Department, requesting approval to place the soil in the landfill. Please review and let me know if you would like me to proceed with this disposal option.

cc: O'Quinn
EAD 772

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SEA289950

Draft Letter

February 9, 1990

Seattle-King County
Department of Public Health
Central Environmental Health Service
172 - 20th Avenue
Seattle, WA 98122

Attention: Steve Burke

Enclosed are the sample analysis results for approximately 150 cubic yards soil contaminated with Bunker C fuel oil and currently stockpiled on-site at City Light's Georgetown Steamplant facility; all samples were analyzed for both TPH and PCB levels. The analysis results indicate that the soil contains no PCBs, however, TPH levels range from 8.61 mg/kg to 67569.6 mg/kg.

The utility requests approval to place this material in the Cedarhills Landfill. Please contact me at 684-3799 if you require additional information to issue such approval.

Sincerely,

Christy O'Quinn
Assistant Environmental Analyst
Environmental Affairs Division

enclosure

bcc: Axelrod
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File

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